

**DIVISION OF SPILL PREVENTION AND RESPONSE  
CONTAMINATED SITES PROGRAM**

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June 5, 2006

Defense Logistics Agency  
Defense Energy Support Center-Alaska  
Attn: Lt. Col. Bruce Bartholomew, Commander  
10480 22<sup>nd</sup> Street  
Elmendorf AFB, AK 99506-2570

RE: Approval of No Further Remedial Action Planned Defense Energy Support Point-  
Anchorage, Database Record Key 198821X111901

Dear Commander Bartholomew:

The Alaska Department of Environmental Conservation (ADEC) received your March 10, 2006 letter requesting a "No Further Remedial Action Required" determination for the Defense Fuel Support Point-Anchorage (DFSP-A) former bulk fuel terminal in Anchorage. DFSP-A is located at 1217 Port Road, at the Port of Anchorage in Anchorage, Alaska. DFSP-A is located in the North 1/2 and Southwest 1/4 of Section 7, Township 13 North, Range 3 West, Anchorage (A-8) NW Quadrangle, Seward Meridian and within the Municipality of Anchorage (MOA) Grids 1030, 1031, and 1130. Your letter included a summary of the remedial actions taken to date at the DFSP-A site.

The 2003 Defense Fuel Support Point Anchorage Record of Decision (ROD) between ADEC and the Defense Energy Support Center established the following remedial action objectives:

- 1) Treatment of Contaminated Soil to method one category C levels for petroleum hydrocarbons and method two levels for benzene, toluene, ethylbenzene, and xylene as defined in 18 AAC 75.341;
- 2) Monitoring groundwater and surface water to verify natural attenuation of contaminants to meet ten times the groundwater cleanup levels specified in 18 AAC 75.345 Table C and the surface water quality criteria (10 µg/l TAH and 15 µg/l TAqH) in surface water;
- 3) Establishing institutional controls to limit excavation of contaminated soil and restrict use of the shallow groundwater until cleanup levels are achieved. Please note that institutional controls limiting groundwater use will need to remain in place until such time the Table C cleanup levels are achieved.

The ROD states, “After three (3) continuous years of water monitoring on a twice-yearly basis, ADEC and DESC will review the data from the monitoring for trend analysis and discuss the adequacy of the monitoring and the need for revising the frequency and/or sampling protocols. At that time, if appropriate, ADEC may consider granting a No-Further Remedial Action (NFRA) determination for remedial action. The NFRA determination by ADEC and subsequent release of the property back to the Army will be based on DESC demonstrating that the size of the dissolved plume is steady state or shrinking, not migrating off-site, and concentrations of the hazardous substance must be decreasing.”

DESC has implemented the remedy as described below:

- Removed all fuel tanks and associated piping from the site;
- Excavated ~30,000 tons of petroleum contaminated soil, backfilled the excavations with clean soil, and reseeded the site; contaminated soil was treated at an approved off-site soil treatment facility;
- Monitored surface water and groundwater at the site and demonstrated decreasing contaminant concentration trends; and
- Established institutional controls through the US Army, at Fort Richardson, which owns the land; excavation clearance permits are required prior to digging at the site and use of the shallow groundwater is restricted until cleanup levels are met.

While elevated levels of soil and groundwater contamination remain on-site, the remedy has been successfully implemented and with effective on-going implementation of institutional controls the site does not pose an unacceptable risk to human health, welfare, safety, and the environment. ADEC has determined the remedy has been successfully implemented and DESC has met its requirements under the ROD to obtain a no further remedial action planned determination and return the property management back to the Army.

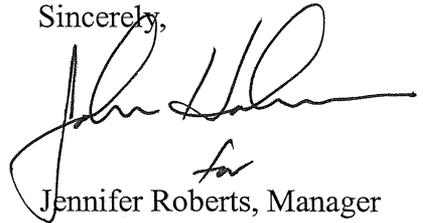
Until officially notified otherwise or an alternative plan is approved, ADEC understands DESC will continue the long-term groundwater monitoring in accordance with the August 2003 Long-Term Monitoring Plan. Any contaminated soil encountered at the site must be managed properly in accordance with the State cleanup rules in 18 AAC 75.

Per the ROD, unless other arrangements are made, any long-term surface water or groundwater monitoring will be the responsibility of the landowner (USARK) if the property is leased out or the new landowner if the property is transferred outright. The Army shall notify ADEC of any conveyance of title, easement, or other interest in the site to other agencies of the United States, to private parties, or to state and local governments at least ninety days prior to such conveyance. This is to allow ADEC and the Department of Law to participate in the transfer process to ensure appropriate institutional controls are established and the responsibilities for any additional groundwater monitoring, use restrictions and contaminated soil management are clearly defined and meet state requirements.

Once it is demonstrated that soil and groundwater consistently meet the applicable cleanup levels throughout the site, ADEC will discontinue the groundwater monitoring requirement and close the site.

If you have any questions regarding this letter, please call John Halverson at (907) 269-7545 or Louis Howard at (907) 269-7552.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Roberts", with a stylized flourish at the end.

Jennifer Roberts, Manager  
Federal Facilities Restoration Program

cc: Jack Appolloni, DESC-A  
Wayne Barnum,  
Kevin Gardner, IMP-FRA-PWE Fort Richardson